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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JUAN VALENTIN MANRIQUEZ, and
ANDREW JACE LARRABURE-TUMA,
15 Defendants.
16

CASE NO. 2:21-cr-0213 KJM
18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing and
Manufacturing Firearms; 18 U.S.C. § 924(d)(1) and
28 U.S.C. § 2461(c) – Criminal Forfeiture

17
18 I N D I C T M E N T

19 The Grand Jury charges: T H A T

20 JUAN VALENTIN MANRIQUEZ, and
ANDREW JACE LARRABURE-TUMA,
21

22 defendants herein, between on or about July 21, 2021, and on or about September 28, 2021, in
23 Sacramento County and El Dorado County, State and Eastern District of California, and elsewhere, not
24 being a licensed dealer and manufacturer of firearms as described in Title 18, United States Code,
25 Section 923, did willfully engage in the business of dealing and manufacturing in firearms, in violation
26 of Title 18, United States Code, Section 922(a)(1)(A).

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1 FORFEITURE ALLEGATION: [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture]

2 1. Upon conviction of the offense alleged in this Indictment, defendants JUAN VALENTIN
3 MANRIQUEZ and ANDREW JACE LARRABURE-TUMA, shall forfeit to the United States pursuant
4 to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c),
5 any firearms and ammunition involved in or used in the knowing commission of the offense.

6 2. If any property subject to forfeiture, as a result of the offense alleged in this Indictment,
7 for which defendants are convicted:

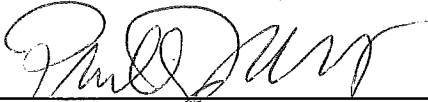
- 8 a. cannot be located upon the exercise of due diligence;
9 b. has been transferred or sold to, or deposited with, a third party;
10 c. has been placed beyond the jurisdiction of the Court;
11 d. has been substantially diminished in value; or
12 e. has been commingled with other property which cannot be divided without
13 difficulty;

14 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28,
15 United States Code, Section 2461(c), to seek forfeiture of any other property of defendants, up to the
16 value of the property subject to forfeiture.

17
18 A TRUE BILL.

19 **/s/ Signature on file w/AUSA**

20 _____
21 FOREPERSON

22 
23 PHILLIP A. TALBERT
24 Acting United States Attorney
25
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27
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No. _____

2:21-cr-0213 KJM

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

**JUAN VALENTIN MANRIQUEZ,
ANDREW JACE LARRABURE-TUMA**

I N D I C T M E N T

VIOLATION(S): 18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing and Manufacturing Firearms;
18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 28th day

of October, A.D. 20 21

/s/ Lisa M. Kennison

Clerk.

Bail, \$ **NO PROCESS NECESSARY**


DENNIS M. COTA

UNITED STATES MAGISTRATE JUDGE

United States v. Juan Manriquez & Andrew Tuma
Penalties for Indictment

Defendants

JUAN VALENTIN MANRIQUEZ

ANDREW JACE LARREBURE TUMA

VIOLATION: 18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing and Manufacturing Firearms

PENALTIES: Imprisonment of up to 5 years; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory)

FORFEITURE ALLEGATION: all Defendants

VIOLATION: 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) - Criminal Forfeiture

PENALTIES: As stated in the charging document